## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, On Behalf of Herself	: Civil Action No. 04-CV-10294-DPW
and All Others Similarly Situated,	: LEST PROTOCURT
	: Hon. Douglas P. Woodlock F MASS
Plaintiff,	i
v.	•
SONUS NETWORKS, INC., HASSAN	
AHMED, and STEPHEN J. NILL,	•
initially, and billificity J. IVILL,	
Defendants.	•
Defendants.	•
	<b>:</b>
INFORMATION DANIANGG LLG	:
INFORMATION DYNAMICS, LLC, On	: Civil Action No. 04-CV-10308-DPW
Behalf of Itself and All Others Similarly	:
Situated,	: Hon. Douglas P. Woodlock
	:
Plaintiff,	
	:
v.	:
	:
SONUS NETWORKS, INC., PAUL R.	( : . )
JONES, EDWARD N. HARRIS, J.	<b>:</b>
MICHAEL O'HARA, HASSAN M.	:
AHMED and STEPHEN J. NILL,	<u>:</u>
_,	•
Defendants.	

MOTION OF PLAINTIFF SAVERIO PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL

:	Civil Action No. 04-CV-10307-DPW
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	Hon. Douglas P. Woodlock
:	Hon. Douglas I. Woodlock
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:	Civil Action No. 04-CV-10309-DPW
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:	Hon. Douglas P. Woodlock
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:	Civil Action No. 04-CV-10310-DPW
:	Hon. Douglas P. Woodlock
•	11021 Douglas I. Woodlock
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RICHARD CURTIS, on Behalf of	:	Civil Action No. 04-CV-10314-MLW
Himself and All Others Similarly	:	10517 1416.44
Situated,		Hon. Mark L. Wolf
	:	TIOH. WAIK L. WOH
Plaintiff,	•	
Flamuii,	:	
	:	
v.	:	
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SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	1:	
	.	
Defendants.	*	
Defendants.	:	:
DONALD KAGGOVED	:	
RONALD KASSOVER, on Behalf of	:	Civil Action No. 04-CV-10329-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	San
Plaintiff,		
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v.	:	· · · · ·
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SOME METWODIES THE THESE STATES	<b>:</b>	
SONUS NETWORKS, INC., HASSAN	:	• •
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
STEVE L. BAKER, Individually and on	:	Civil Action No. 04-CV-10333-DPW
Behalf of All Others Similarly Situated,		01411 71611011 140. 04-C V-10333-DF W
		Hon Douglas D. W 11 1
Plaintiff,	•	Hon. Douglas P. Woodlock
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<u>.                                    </u>	:	
V.	:	
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SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
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Defendants.	:	
Detendants.	•	
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MICHAEL KAFFEE, on Behalf of	:	Civil Action No. 04-CV-10345-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
	<b>:</b>	
v.	:	
SONUS NETWORKS, INC., HASSAN		•
AHMED, and STEPHEN J. NILL,		
,,		
Defendants.	:	
HAIMING HU, Individually and on	•	Circle A -41 N. O4 CXV 100 46 DDXV
Behalf of All Others Similarly Situated,	•	Civil Action No. 04-CV-10346-DPW
Behan of An Others Shimarry Shuated,	:	13 D 1 D 122 # 2
DI- :4: CC	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
	:	
v.	:	
000	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	;	
	:	
Defendants.	;	
	:	
CHARLES STARBUCK, Individually	:	Civil Action No. 04-CV-10362-DPW
and on Behalf of All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	a sugarative controls
Plaintiff,		
,		
.v.		
	:	
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,		
TAMES OF THE STATE	:	
Defendant	:	
Defendants.	:	
	:	

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SAMUEL HO, Individually and on	: Civil Action No. 04-CV-10363-DPW
Behalf of All Others Similarly Situated,	:
	: Hon. Douglas P. Woodlock
Plaintiff	:
V.	:
	•
SONUS NETWORKS, INC., HASSAN	•
AHMED, and STEPHEN J. NILL,	
	•
Defendants.	
JEFFREY C. RODRIGUES, Individually	: Civil Action No. 04-CV-10364-DPW
and on Behalf of All Others Similarly	: 01/11/10/10/11/10. 04-C V-10304-DPW
Situated,	: Hon. Douglas P. Woodlock
	· How Douglas I. WOOdlock
Plaintiff,	
v.	
SONUS NETWORKS, INC., HASSAN	
AHMED, and STEPHEN J. NILL,	
, and Silling, Rill,	
Defendants.	
Defendants.	
ROBERT CONTE and MARK	· Civil Avdiva N. Od CVV docod
RESPLER, On Behalf of Themselves and	: Civil Action No. 04-CV-10382-DPW
all Others Similarly Situated,	Hen Don't D.W.
an omero bilinarry bituated,	: Hon. Douglas P. Woodlock
Plaintiff	•
Plaintitt	•
77	:
V.	•
SONIIS NETWODES INC. HASSIS	
SONUS NETWORKS, INC., HASSAN	
AHMED, and STEPHEN J. NILL,	:
Defendants.	:
	<u>:                                    </u>

WHEATON ELECTRICAL SERVICES	:	Civil Action No. 04-CV-10383-DPW
RETIREMENT 401K PROFIT	:	
SHARING, On Behalf of Itself and All	:	Hon. Douglas P. Woodlock
Others Similarly Situated,	:	
	:	
Plaintiff,	<b> </b> :	
v.	:	
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,		
Taranto, and Distilled J. MILL,	•	
	:	
D.C. 1	:	
Defendants.		
BRIAN CLARK, On Behalf of Himself	:	Civil Action No. 04-CV-10454-DPW
and All Others Similarly Situated,	:	
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
	:	
v.	:	
	•	
SONUS NETWORKS, INC., PAUL R.		
JONES, EDWARD N. HARRIS, J.		
MICHAEL O'HARA, HASSAN M.	:	
AHMED and STEPHEN J. NILL.	•	
AMERICA AND STEP MEN J. NILL,	•	
	:	
D.C.	:	
Defendants.		
SHEILA BROWNWELL, On Behalf of	:	Civil Action No. 04-CV-10597-DPW
Herself and All Others Similarly	<b>:</b>	
Situated,	:	Hon. Douglas P. Woodlock
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Plaintiff,	:	
	:	
v.		
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,		
, and other rest,		
	:	
	:	
Defendants.	:	
SAVERIO PUGLIESE, On Behalf of	:	Civil Action No. 04-CV-10612-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	Ome = : I valoud
Plaintiff,	:	
	.	
v.		
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SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL.	:	
ind STEITIEN 3. WILL,		
	:	
Defendants.	<u>:</u>	
DAVID V. NOCITO, On Behalf of	:	Civil Action No. 04-CV-10623-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
	:	
<b>v.</b>	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	

PLEASE TAKE NOTICE that pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), Plaintiff Saverio Pugliese ("Pugliese") will move this Court, at a time and place to be determined later, for an Order:

- (1) consolidating the above-captioned related actions filed on behalf of the purchasers of Sonus Networks, Inc. common stock;
- (2) appointing Pugliese as Lead Plaintiff in the above related actions under Section 21(D)(a)(3)(B) of the PSLRA; and
- (3) approving Pugliese's selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

Case 1:04-cv-10294-DPW

This motion is supported by the accompanying Memorandum of Law in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel, the Affidavit of Richard Speirs in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel together with the exhibits attached thereto, the [Proposed] Order Consolidating the Actions, Appointing Plaintiff and Saverio Pugliese Lead Plaintiff and Approving Lead Plaintiff's Choice of Lead Counsel and Liaison Counsel, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: Boston, MA April 12, 2004

Respectfully submitted,

## BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO

Proposed Liaison Counsel for the Class

ZWERLING, SCHACHTER & ZWERLING, LLP

Richard A. Speirs Kevin M. McGee 845 Third Avenue New York, NY 10022 Phone: (212) 223-3900

Fax: (212) 371-5969

Proposed Lead Counsel for the Class